

1 DIONE C. WRENN, ESQ.
2 Nevada Bar No. 13285
GORDON REES SCULLY MANSUKHANI, LLP
3 300 S. 4th Street, Suite 1550
4 Las Vegas, NV 89101
5 Telephone: (702) 577-9300
Direct Line: (702) 577-9304
Facsimile: (702) 255-2858
Email: dwrenn@grsm.com

6 *Attorneys for Defendants,*
7 **UNIVERSAL PROTECTION SERVICE, LP, d/b/a**
ALLIED UNIVERSAL SECURITY

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PAUL SINGLETERRY, an individual,

ntiff

VS.

UNIVERSAL PROTECTION SERVICE, LP, d/b/a
Allied Universal Security, a Foreign Limited
Partnership,

Defendant.

CASE NO. 2:25-cv-00638-JAD-MDC

**STIPULATED DISCOVERY PLAN
AND SCHEDULING ORDER**

**[SUBMITTED IN COMPLIANCE
WITH LR 26-1(b)]**

Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 26-1, the parties submit their proposed discovery plan and scheduling order as follows.

I. Fed. R. Civ. P. 26(f) Conference: Pursuant to Fed R. Civ. P. 26(f) and LR 26-1(a), the parties conferred on June 2, 2025. Dione C. Wrenn, Esq. on behalf of Defendant Universal Protection Service, LP (“Defendant” or “Universal”) and Trevor J. Hatfield, Esq. on behalf of Plaintiff Paul Singleterry (“Plaintiff” or “Singleterry”) participated in the conference.

II. **Initial Disclosures:** Pursuant to Fed. R. Civ. P. 26(a)(i)(A), The parties will make their initial disclosures pursuant to Fed. R. Civ. P. 26(a)(i)(A), by **June 16, 2025**.

III. **Areas of Discovery:** Discovery should include but not be limited to all claims and defenses allowed pursuant to the Federal Rules of Civil Procedure.

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1 **IV. Discovery Plan:**2 **1. Discovery Cut-Off Date:** Pursuant to LR 26-1(b)(1), the parties stipulate that
3 discovery shall be completed no later than **November 12, 2025**, which is one hundred (180) days
4 from the date Universal answered. Universal filed its Answer to the Complaint on May 16,
5 2025.6 **2. Amending the Pleadings and Adding Parties:** Pursuant to LR 26-1(b)(2), all
7 motions to amend the pleadings or to add parties shall be filed not later than **August 14, 2025**,
8 ninety days (90) before the discovery cut-off date.9 **3. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):** Pursuant to LR 26-1(b)(3),
10 expert witness disclosures shall be made by **September 15, 2025**¹, which is more than sixty (60)
11 days before the discovery cut-off date. Disclosures of rebuttal experts shall be made by **October**
12 **15, 2025**, which is thirty (30) days after the initial disclosure of experts. The requirements of
13 Fed. R. Civ. P. 26(a)(2) shall apply to any such disclosures.14 **4. Dispositive Motions:** Pursuant to LR 26-1(b)(4) the parties shall have until
15 **December 12, 2025**, to file dispositive motions, thirty (30) days after the discovery cut-off. In
16 the event the discovery cut-off is extended, the deadlines for filing dispositive motions
17 automatically will be extended until thirty (30) days after the new discovery cut-off date.18 **5. Pretrial Order:** Pursuant to LR 26-1(b)(5), the parties will prepare a joint pretrial
19 order on or before **January 12, 2026**², which is more than thirty (30) days after the date set for
20 filing dispositive motions in the case. This deadline will be suspended if dispositive motions are
21 timely filed until thirty (30) days after the decision of the dispositive motions or until further
22 order of the court. The disclosures required by Fed. R. Civ. P. Rule 26(a)(3) and objections
23 thereto, shall be made in the pre-trial order.24 **6. Fed. R. Civ. P. 26(a)(3) Disclosures:** Pursuant to LR 26-1(b)(6), disclosures
25 required by Fed. R. Civ. P. 26(a)(3), and any objections thereto, shall be included in the joint
26 pretrial order.27
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¹ September 13, 2025 falls on a Saturday.² January 11, 2026 falls on a Sunday.

1 **7. Extensions or Modifications of the Discovery Plan and Scheduling Order:**
2 LR 26-3 governs modifications or extensions of this discovery plan and scheduling order in
3 addition satisfying the requirements of LR IA 6-1 be supported by a showing of good cause for
4 the extension. Any stipulation or motion to extend a deadline set forth in the discovery plan and
5 scheduling order must be made not later than twenty-one (21) days before the expiration of the
6 subject deadline. Any stipulation or motion to extend the discovery cut-off period must be made
7 no later than **October 22, 2025**, twenty-one (21) days before the discovery cut-off date.

8 **V. Court Conferences:** If the court has questions regarding the dates proposed by the
9 parties, the parties request a conference with the court before entry of the scheduling order.

10 **VI. Format of Discovery:** Pursuant to the electronic discovery amendments to the Federal
11 Rules of Civil Procedure effective December 1, 2006, the parties addressed the e-discovery issues
12 pertaining to the format of discovery at the Rule 26(f) conference. The parties do not anticipate
13 discovery of native files or metadata at this time, but each party reserves the right to request such
14 electronic data as discovery progresses.

15 **VII. Alternative Dispute Resolution:** The parties hereby certify pursuant to LR 26-1(b)(7)
16 they met and conferred about the possibility of using alternative dispute-resolution processes
17 including mediation, arbitration and, if applicable, early neutral evaluation (collectively, **ADR**).
18 The parties do not believe formal alternative dispute resolution will assist parties at this time.

19 **VIII. Alternative Forms of Case Disposition:** The parties hereby certify that pursuant to LR
20 26-1(b)(8) they considered consent to trial by a magistrate judge and use of the short trial
21 program. The parties do not consent to either at this time.

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1 **IX. Electronic Evidence:** The parties hereby certify they met and conferred about the use of
2 electronic evidence pursuant to LR 26-1(b)(9). They anticipate presenting evidence in electronic
3 format to jurors for the purposes of jury deliberations and will continue to meet and confer on this
4 issue as necessary.

5 DATED this 30th day of June 2025.

6 **GORDON REES SCULLY**
7 **MANSUKHANI**

8 */s/ Dione C. Wrenn*

9 DIONE C. WRENN, ESQ.
10 Nevada Bar No. 13285
11 300 South Fourth Street, Suite 1550
12 Las Vegas, Nevada 89101
13 *Attorneys for Defendant,*
14 *Universal Protection Service, LP, d/b/a*
15 *Allied Universal Security*

5 DATED this 30th day of June 2025.

6 **HATFIELD & ASSOCIATES, LTD.**

7 */s/ Trevor J. Hatfield*

8 TREVOR J. HATFIELD, ESQ.
9 Nevada Bar No. 7373
10 703 South Eighth Street
11 Las Vegas, Nevada 89101
12 *Attorney for Plaintiff,*
13 *Paul Singletary*

14 IT IS SO ORDERED.

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16 UNITED STATES MAGISTRATE JUDGE

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18 DATED: 7-1-25